

The Hon. James P. Donohue
Chief Magistrate Judge

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

CASE NO. 2:17-CV-00218-RSM-JPD

Daniel Ramirez Medina,

Petitioner,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY; JOHN KELLY, Secretary of
Homeland Security; NATHALIE ASHER,
Director of the Seattle Field Office of U.S.
Immigration and Customs Enforcement,

Respondents.

**DECLARATION OF LUIS CORTES
ROMERO IN SUPPORT OF
PETITIONER'S RESPONSE BRIEF RE:
COURT'S FEBRUARY 14, 2017, ORDER
DIRECTING SERVICE, SETTING
STATUS CONFERENCE, AND
SETTING BRIEFING SCHEDULE**

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1 I, Luis Cortes Romero, declare as follows:

- 2 1. I am an attorney admitted to practice law *pro hac vice* before this Court. I am a managing
3 attorney in the law firm of Barrera Legal Group, and I am one of the attorneys representing
4 Daniel Ramirez Medina ("Mr. Ramirez") in this case. I submit this declaration in support of
5 Mr. Ramirez's Response to the Respondent's Brief re: Court's February 14, 2017, Order
6 Directing Service, Setting Status Conference, and Setting Briefing Schedule. The following
7 facts are within my personal knowledge and, if called and sworn as a witness, I would testify
8 competently to these facts.
- 9 2. On Saturday, February 11, 2017, I began representing Mr. Ramirez in connection with his
10 detention by U.S. Immigration and Customs Enforcement ("ICE").
- 11 3. I visited Mr. Ramirez at the Northwest Detention Center, a private immigration prison
12 operated on behalf of ICE, in Tacoma, Washington on February 11, February 12, February 14,
13 and February 15, 2017.
- 14 4. Each time I visited Mr. Ramirez, I signed in as a lawyer visiting Mr. Ramirez.
- 15 5. Each time I visited Mr. Ramirez, he showed me or spoke to me about all the documents given
16 to him since his arrest on February 10, 2017. I have not seen a Notice to Appear, nor have I
17 seen any other document related to removal proceedings. I have also not seen any document
18 relating to the termination of Mr. Ramirez's Deferred Action as a Childhood Arrival.

19
20 I declare under penalty of perjury under the laws of the United States and the State of
21 Washington that the foregoing is true and correct, and that I executed this Declaration on February
22 16, 2017 in Seattle, Washington.

23
24 /s/ Luis Cortes Romero
25 Luis Cortes Romero
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